

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

CLERK  
U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED

LEONARD PATTI

2017 JAN 17 P 12:20

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

DR. GEORGE C. PECK JR

COMPLAINT

Jury Trial:  Yes  No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

**I. Parties in this complaint:**

A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff

Name

LEONARD PATTI

Street Address

80 HERMAN ST.

County, City

BERGEN CO., NJ

State & Zip Code

NEW JERSEY 07073

Telephone Number

551 574 0541

B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name GEORGE C. PECK JR.  
Street Address 776 NORTHFIELD AVE  
County, City ESSEX CO., W. ORANGE  
State & Zip Code N.J. 07052

Defendant No. 2

Name \_\_\_\_\_  
Street Address \_\_\_\_\_  
County, City \_\_\_\_\_  
State & Zip Code \_\_\_\_\_

Defendant No. 3

Name \_\_\_\_\_  
Street Address \_\_\_\_\_  
County, City \_\_\_\_\_  
State & Zip Code \_\_\_\_\_

Defendant No. 4

Name \_\_\_\_\_  
Street Address \_\_\_\_\_  
County, City \_\_\_\_\_  
State & Zip Code \_\_\_\_\_

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

A. What is the basis for federal court jurisdiction? (check all that apply)

Federal Questions  Diversity of Citizenship  
 U.S. Government Plaintiff  U.S. Government Defendant

B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? AMENDMENT TO THE U.S. CONSTITUTION, ARTICLE VII  
1- MY RIGHT TO A TRIAL BY JURY  
2- ACCORDING TO THE RULES OF COMMON LAW.

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship \_\_\_\_\_

Defendant(s) state(s) of citizenship \_\_\_\_\_

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? DR. GEORGE C. PECK'S OFFICE  
776 NORTHFIELD AVE, ESSEX CO, W. ORANGE, N.J.  
07052

B. What date and approximate time did the events giving rise to your claim(s) occur? 12-16-2014  
APPROX. 10:00 AM — PREVIOUS 6-6-2013 —  
PREVIOUS JUNE 9, 2011 — PREVIOUS 3-11-2010

C. Facts: I SUFFERED FOUR OPERATIONS. I HAVE  
FOUR OPERATIVE REPORTS THAT CLEARLY PROVE DR. PECK  
HAD NO INTENTION OF REMOVING THE IMPLANT, AS  
HE COMMITTED TO DO - IN THE CONSULTATION VISIT.

What happened to you?

Who did what?

Was anyone else involved?

Who else saw what happened?

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#### IV. Injuries

If you sustained any injuries related to the events alleged above, describe them, and state what medical treatment, if any, you required and received.

The injuries were four operations: I am entitled to the dignity, to not be put through such an ordeal.

It is now six years since this implant was supposed to be taken out.

What gives Dr. Peck the right to operate on my body; and make decisions contrary to what we agreed upon? As the operative reports so state. Dr. Peck's license to practice medicine should be revoked. Asside from the 4 operations, he trimmed the part of the implant resting on the dorsum, leaving it sit right on the sore spot; increasing the discomfort (40 years) ten times. Why was the implant resting on the dorsum in the first place ?

I told Dr. Peck I do not take drugs or medication. I believe he was jealous: I believe that was one of the reasons he started takeing advantage of me, as others, so stated. If this operation wasn't absolutely necessary, I would never have agreed to an operation or anesthesia:

I still require an operation. I can't put up with this phony implant any longer.

Dr. Peck was not obligated to do the operation in the first place. He did the three subsequent operations to cover his tracks. He had to cover his tracks becsuse he had no other excuse: his act was intentional.

#### V. Relief:

State what you want the court to do for you, and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

What price can you put on four operations? It is obvious Dr. Peck had no intention of removing the implant. Therefore the basis for the suit is the fact that his action was intentional. It was an assault . I went through my whole life never intending to sue anyone. But this was totally unconscionable, dispicable, and nasty. I never expected this sort of thing, especially, from a doctor. The reason he did it was because the Affidavit of Merit gave him a license to do so.

I believe I should be entitled to punitive damages? I attempted to file criminal charges at the W. Orange police dept. but the police called Dr. Peck; and he told them that it was a malpractice case, so the police would not let me file charges.

I am seeking \$40,000 plus the \$7,400 I gave him originally, for the operations. I would not go through one operation for that price.

If I were able to get a lawyer and an operation @ \$20,000, the only quote I have thus far; my cost would be 62% of what I am suing for, not including my time and trouble: one year filing motions & briefs, and pain and suffering.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 16 day of JANUARY, 20 17.

Signature of Plaintiff Leonard Patti  
Mailing Address 80 HERMAN ST.  
E. RUTHERFORD, N.J.  
Telephone Number 201 921 7713  
Fax Number (if you have one) \_\_\_\_\_  
E-mail Address \_\_\_\_\_

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff: Leonard Patti